

Re: MB Docket No. 04-233

To Whom It May Concern:

WDEL 1150AM and WSTW 93.7FM, two radio stations owned by Delmarva Broadcasting Company, are proud to have an extraordinary community presence.

WDEL has a news-talk format. We use this format to embody the FCC's stated goal of radio as a 'community mouthpiece.'¹ Every week, 108 hours of programming are produced in-house, covering a wide range of local issues. The remaining 60 hours per week of non-local programming are often pre-empted for local sports competitions, political debates, breaking-news stories, and other local programming.

WSTW's format is CHR, airing local programming from 5:30am until midnight, Monday through Saturday, and 9am to midnight on Sunday. Local news and sports reports are included in the morning drive program, Monday through Friday. Two locally produced shows, 'Hometown Heroes', devoted to local musical talent, and 'WSTW Top 20 Countdown,' a call-in program where listeners rate songs currently in rotation, are favorites with our listeners, allowing them to feel like an integral part of 'their' radio station. WSTW is firmly embedded in the community.

WDEL and WSTW are more than simply opinions and songs over the airwaves, however; all Delmarva Broadcasting Company stations are committed "to the unique interests and needs of individual communities,"² in keeping with the recent FCC Notice of Inquiry. For example:

- WDEL's award-winning newsroom routinely breaks stories on the local, county and state levels.
- Our Snowwatch closing reports on-air and the accompanying advisory page on WDEL.com and WSTW.com are the first choice for residents when they need school and business closings due to inclement weather.
- WDEL is an active part of local political dialog, holding primary candidate and general election candidate debates, uninterrupted by commercials. WDEL is sought out by candidates as a critical component in their campaign coverage.
- Both WDEL and WSTW air public affairs programming - PSAs and a 30 minute show produced in our studios.
- And, most importantly, both stations are active in the community with remote broadcasts at major nonprofit events.

Our on-air personalities and station executives host most of the major nonprofit events in New Castle County, and our stations spearheaded 9/11 commemorative events and fundraising drives for our service personnel in Iraq and Afghanistan. Additionally, WDEL is a co-founder of a forum series, Forum USA, that brings nationally-known

¹ Notice of Inquiry, MB Docket No. 04-233, Introduction ¶2. See *FCC v. Allentown Broadcasting Corp.*, 349 U.S. 358, 362 (1955).

² Notice of Inquiry, MB Docket No. 04-233, Introduction ¶4.

lawmakers, pundits, entertainers and community activists together three times per year to foster dialog that is designed to support community groups committed to making Delaware a better place to live and work. Our presence outside of the studios is one of the reasons both stations win ‘Best of’ awards from various sources, year after year.

In short, we agree with the Commission’s belief that ‘market forces, in an increasingly competitive environment, would encourage broadcasters to accomplish [the goal of responsiveness to the interests and needs of their communities], and that certain rules were no longer necessary.’³ Our commitment to localism is one of the most important factors in our high levels of listener loyalty, employee pride and profitability. **Localism is just good radio-business sense**, good for our community *and* good for our bottom line. Imposing regulations to enforce a standard we already hold would not only be a wasteful doubling of effort, but would also shift energy from realizing the goal of localism to ensuring that we do not violate the FCC rules on localism; **the FCC becomes the audience we serve, not our community.**

We feel the Commission does not need to impose new regulations on radio stations to promote localism, and WDEL and WSTW are the proof. To get the best picture of our current community involvement and commitment to local programming, please view the attached spreadsheet, which is separated into eight key components: local news programming; local public affairs programming; creating/selecting community programming; emergency responsiveness; political programming; civic/cultural programming and involvement; local music programming; and, community participation. We hope you find it an informative response to your Notice of Inquiry.

Thank you.

Sincerely,

Julian H. Booker
President/CEO
Delmarva Broadcasting Company

³ Notice of Inquiry, MB Docket No. 04-233, Introduction ¶1. See, e.g., *Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, 98 F.C.C.2d 1075, ¶¶31-32 (1984) (“*Commercial TV Deregulation Order*”).